



Fox Rothschild LLP
ATTORNEYS AT LAW

101 Park Avenue, Suite 1700
New York, NY 10178
Tel 212.878.7900 Fax 212.692.0940
www.foxrothschild.com

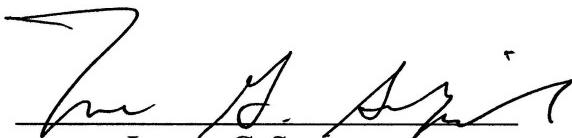
ALEXANDER W. BOGDAN, ESQ.
Direct Dial: 212-878-7941
Email Address: ABogdan@FoxRothschild.com

Application **GRANTED in part and DENIED in part**. Defendant Empire Jointstar, Inc.'s deadline to answer or otherwise respond to the Complaint is extended to **April 15, 2025**. The request to adjourn the initial conference is denied. The Court does not typically adjourn the initial conference based on the answer deadlines. So Ordered.

Dated: March 4, 2025
New York, New York

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

**Re: Francis v. 400 Park Ave Co. LLC, et al., CA No. 1:24-cv-08378 (LGS)
Request for Extension of Time to Respond to the Amended Complaint
and Request to Adjourn Initial Conference**

Your Honor:

We represent defendants 400 Park Ave Co. LLC, LBB 400 LLC, BWB 400 LLC, FCB 400 LLC, and Empire Jointstar, Inc. (collectively, "Defendants") in the above-referenced matter. Pursuant to Rule I (B) (3) of Your Honor's Individual Rules and Procedures for Civil Cases, Defendant Empire Jointstar, Inc. respectfully requests that the deadline to answer or otherwise respond to the Amended Complaint be extended from March 14, 2025 to April 15, 2025, the current deadline for all other defendants' response to the Amended Complaint. We ask for all parties to have the same deadline for efficiency.

Defendants also request an adjournment of the upcoming initial conference currently scheduled for March 18, 2025 until after such time that Defendants have filed their response to the Amended Complaint. Plaintiff's counsel consents to this request, but asks that due to their travel schedule, that the conference be scheduled for the week of April 21 or thereafter.

This application is defendant Empire Jointstar, Inc.'s first request for an extension of time to respond to the Amended Complaint and Defendants first request for an adjournment of the upcoming initial conference.

We thank the Court for its consideration of our request.

Respectfully submitted,
/s/ Alexander W. Bogdan
 Alexander W. Bogdan, Esq.

cc: Glen H. Parker, Esq. (*via ECF*)